



AMENDMENT & RESPONSE

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connector and the communications link when the device is coupled through the connectors.

Applicant submits that amended claim 1 reasonably conveys to one skilled in the art how to make and use the claimed keyboard. Applicant's claim is to a variety of devices that may be operatively coupled to the keyboard via the connector, which is fully supported by the specification. A broad claim is not to be equated with an indefinite claim (see MPEP 2173-04). Therefore, Applicant respectfully requests that the Examiner withdraw the rejection of claims 1-16.

Rejections Under 35 U.S.C. § 102

Claims 1-6, 10, and 15 were rejected under 35 U.S.C. § 102(b) as being anticipated by Richardson et al. (U.S. Patent No. 4,762,435). Applicant respectfully traverses the rejection because Richardson does not teach each and every element of Applicant's claims.

Applicant's independent claim 1 contains the limitation of "a communications link disposed within the housing to communicatively couple the keyboard to the computer." In contrast to Applicant's invention, Richardson discloses a lettering device having a keyboard that interfaces with a printer device, not a computer (see column 2, lines 8-32 and column 4, lines 7-14). Applicant has thoroughly reviewed Richardson, and can find no reference to a computer of any kind. Thus, Richardson does not teach or disclose a keyboard communicatively coupled to a computer and the Examiner is respectfully requested to withdraw the rejection of claim 1.

Applicant's independent claim 1 also contains the limitation that "the device communicates with the computer over the communications link when the connectors are coupled." As noted above, Richardson does not teach or disclose the use of a computer of any sort. Therefore Richardson does not teach or disclose that the device communicates with a computer over the communications link when the connectors are coupled. The Examiner is respectfully requested to withdraw the rejection of claim 1.

Claims 2-6, 10 and 15 are dependent on claim 1. Applicant respectfully submits that claims 2-6, 10 and 15 are patentably distinct from Richardson for the same reasons as claim 1. Applicant therefore respectfully requests that the Examiner withdraw the rejection of claims 2-6, 10 and 15.

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Claim 10 includes the limitation of "a power source disposed within the housing." The Office Action states that "power supplies are inherent in the design of all computer devices." Applicant respectfully traverses. While many computer devices need power, the power supply need not be disposed within the housing of the computer device, and may be external to the device. For example, keyboards do not require a power supply disposed within their housing, the power is typically supplied via a cable connecting the keyboard to the computer. Unlike Applicant's claim 10, Richardson does not teach or disclose a power source disposed within the housing. Applicant therefore requests that the Examiner withdraw the rejection to claim 10, or provide evidence or rationale for the statement that power supplies are inherent in the design of all computer devices (see MPEP § 2112).

For the above reasons, Richardson does not teach all of the limitations found in Applicant's claims 1-6, 10 and 15, and the Examiner is respectfully requested to withdraw the rejection to claims 1-6, 10 and 15.

Claims 22 and 23 were rejected under 35 U.S.C. § 102(b) as being anticipated by Willett (U.S. Patent No. 5,520,470). Applicant respectfully traverses the rejection because Willett does not contain each and every limitation found in Applicant's claims.

Claim 22 contains the limitation that the keyboard has "a connection removably coupling the device to the keyboard in a docking mode." Unlike Applicant's invention, Willett teaches a connection located on the underside of the computer 18 to which the keyboard 26 is attached, not the keyboard itself (see column 3, lines 25-30). As a result, Willett does not teach a keyboard having a connection removably coupling a device to the keyboard. Therefore, the Examiner is respectfully requested to withdraw the rejection of claim 22.

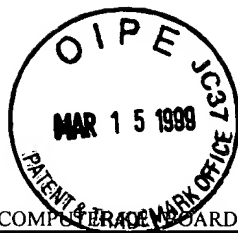
Claim 23 is dependent on claim 22, and Applicant respectfully submits that it is patentably distinct from Willett for the same reasons as claim 22. In addition, claim 23 contains the limitation that the "keyboard includes a recharger to recharge a battery of the device when in the docking mode." Applicant has carefully reviewed Willett, and can find no teaching of a recharger included in the keyboard. Willett does disclose a recharger, however the recharger is located in the printer device attached to the computer having a keyboard, not the keyboard itself. As a result, Applicant's claim 23 contains limitations not found in Willett, and the Examiner is

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respectfully requested to withdraw the rejection of claim 23.

Rejections Under 35 U.S.C. § 103

Claims 16-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Richardson et al. Applicant respectfully traverses the rejection because the Office Action fails to present a prima facie case of obviousness.

In order to establish a prima facie case of obviousness, each and every limitation in the prior art must be found in the references. Claims 16 - 18 depend on claim 1, and therefore include the limitations of "a communications link disposed within the housing to communicatively couple the keyboard to the computer" and a "connector operatively coupled to the communications link, said connector disposed within the housing and receptive to a corresponding connector of a device such that the device communicates with the computer over the communications link when the connectors are coupled." As discussed above, Richardson fails to teach or disclose a computer of any kind, and therefore does not teach the limitations mentioned above. Therefore, the Office Action fails to establish prima facie case of obviousness. The Examiner is respectfully requested to withdraw the rejection of claims 16-18.

In addition, no second reference was used in this obviousness rejection. Applicant respectfully traverses the single reference rejection under 35 U.S.C. § 103 since not all of the recited features of the claims are found in the single patent to Richardson. Since all the elements of the claims are not found in the prior art, Applicant assumes that the Examiner is taking Official Notice of the missing elements and functions. Applicant respectfully objects to the taking of Official Notice with a single reference obviousness rejection and, pursuant to MPEP § 2144.03, Applicant respectfully traverses the assertion of Official Notice and requests that the Examiner cite patents and/or references in support of this position.

Claims 7-9, 11-13 and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Richardson et al. as applied to claims 1, 6, 11 and 17 above, and further in view of Toda (U.S. Patent No. 5,659,594). Applicant respectfully traverses the rejection because the combination of Richardson and Toda is improper, and because the combination of Richardson and Toda does not result in Applicant's invention.

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The combination of Richardson and Toda is improper because there is no motivation to combine the two references. As discussed above, Richardson discloses a lettering device having a keyboard interface. Toda, as the Examiner notes, teaches a mobile telephone system capable of adapting a portable telephone set. Applicant has carefully reviewed Richardson, and can find no reference to the desirability of including a telephone with the lettering device. Furthermore, Applicant has carefully review Toda, and can find no teaching or disclosure of the desirability of including a lettering device with the mobile telephone system of Toda. Therefore, there is no motivation to combine Richardson and Toda, and their combination is improper.

Even if such a combination were proper, the combination of Richardson and Toda yields a device very different from Applicant's invention. The combination of Richardson and Toda yields a lettering device capable of connecting to a portable telephone system. This is quite different from Applicant's claimed structure which allows a modular device to communicate with a computer through a connector in a keyboard.

In addition, claim 9 contains the limitation of "a recharger operatively coupled to the connector of the keyboard." Neither Richardson nor Toda disclose such a recharger, and therefore the combination of Richardson and Toda fails to establish a prima facie case of obviousness.

For the above reasons, the Examiner is respectfully requested to withdraw the rejection of claims 7-9, 11-13 and 19.

Claim 14 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Richardson et al. as applied to claim 1 above, and further in view of Goodman et al. (U.S. Patent No. 5,633,782). Applicant respectfully traverses the rejection because the combination of Richardson and Goodman fails to teach each and every limitation in Applicant's claim 14. As the Office Action correctly notes, Richardson does not teach a touch screen device having at least one changeable virtual key. The Office Action goes on to state that Goodman teaches a computer tablet that includes a screen that is written with an RF probe. The Office Action appears to assert that the computer tablet is the same as a touch screen. Applicant respectfully disagrees with this assertion. A touch screen is sensitive to a user's touch, and does not require the use of an RF pen as does the computer table in Goodman. Therefore, Goodman fails to teach or disclose a touch

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screen.

In addition, Applicant has carefully reviewed Richardson and Goodman and can find no reference to a "changeable virtual key". For the above reasons, Richardson in view of Goodman fail to teach each and every limitation in claim 14, and therefore the Office Action fails to establish a prima facie case of obviousness. The Examiner is respectfully requested to withdraw the rejection of claim 14.

Claims 20, 21 and 24-28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Willett as applied to claims 22 and 23 above, and further in view of Goodman et al. Applicant respectfully traverses the rejection because Willett in view of Goodman fails to teach each and every limitation in claims 20, 21 and 24-28. As the Office Action correctly states, Willett does not teach or disclose a touch screen. In addition, as noted above, Goodman also fails to teach or disclose a touch screen. Instead, Goodman discloses a computer table with an RF pen. As a result, neither Willett nor Goodman disclose a touch screen, and a prima facie case of obviousness cannot be established.

In addition, with respect to claims 24-28, Applicant has carefully reviewed both Willett and Goodman and can find no reference to a changeable virtual key. As a result, the combination of Willett and Goodman fails to teach each and every limitation in claims 24-28. Therefore, the Office Action fails to establish a prima facie case of obviousness, and the Examiner is respectfully requested to withdraw the rejection of claims 24-28.

For all of the above reasons, the Examiner is requested to withdraw the rejection of claims 20, 21, and 24-28.

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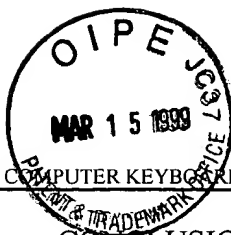
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CONCLUSION

Claim 1 having been amended in this response, claims 1-28 are now pending in the application. For the reasons stated above, Applicant believes that the pending claims are now in condition for allowance. Reconsideration and an early allowance of claims 1-28 are requested. Please charge any fees deemed necessary to Deposit Account 50-0439. The Examiner is invited to contact the below-signed attorney if any questions remain with respect to the present invention.

Respectfully submitted,

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Date MARCH 10, 1999

By 

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to Assistant Commissioner of Patents, Washington, D.C. 20231 on **March 10, 1998**.

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